

Exhibit J

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**
ZACHARY ADAMSON,

Plaintiff,

v.

CITY OF BUFFALO, CITY OF BUFFALO,
POLICE DEPARTMENT, JOSEPH COOK,
MICHAEL KEANE and SHARON ACKER,

Defendants.

**PLAINTIFF'S INITIAL
DOCUMENT DEMAND TO
DEFENDANT JOSEPH COOK**

Civil Docket No. 11-CV-0663A

YOU ARE HEREBY COMMANDED to deliver to the offices of Spadafora & Verrastro, LLP, 2 Symphony Circle, Buffalo, New York 14201, attorneys for Plaintiff, within thirty (30) days of the service of this demand, the following documents:

SCHEDULE OF DOCUMENTS FOR PRODUCTION Definitions and Instructions

1. "Document" means any handwritten, typewritten, printed, recorded, or graphic matter however produced or reproduced, whether or not in possession, custody, or control of City of Buffalo Police Department and whether or not claimed to be privileged against discovery on any ground, including, but not limited to, reports, records, list, memoranda, correspondence, telegrams, schedules, computer disks, tapes, diskettes, computer memory, transcripts, photographs, sound recordings or films, and any copies of such documents upon which appear any initialing, notation or hand writing or any kind which does not appear on the original.

2. If any privilege is claimed as to any document, please state for each document its date, author, addressee(s), format (e.g. memo, letter, notes, etc.), the nature of the privilege claimed (e.g., attorney-client, work product), and the basis for the claiming of privilege as to each specific item of information.

REQUESTED DOCUMENTS

1. Produce a copy of your credentials, including any resume or other document describing current employers, past employers and work experience, and education.
2. Produce a copy of any and all certificates or any other documents received through May 2010 as verification of the completion of staff in-service, continuing education, or any other training program that you have taken that was required or recommended by the City of Buffalo and/or City of Buffalo Police Department, whether provided by the City of Buffalo or City of Buffalo Police Department itself or not.
3. Produce a copy of any and all certificates or any other documents received as verification of the completion of any training received in satisfaction of a recommendation or requirement by any level of government to which you are subject as an officer or employee with the City of Buffalo and/or City of Buffalo Police Department.
4. Produce a copy of any materials used for training or instruction, or which were otherwise provided for your information, during any training program for which you have provided documents in response to paragraphs 2 and 3 of this request.
5. Produce a copy of any notes, handwritten or otherwise, taken during or in relation to any training session for which you have provided documents in response to paragraphs 2 and 3 of this request.
6. Produce a copy of any and all calendars, schedules, or any other documents outlining, describing, or otherwise memorializing the course of your work activity on April 1, 2010.

7. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, describing any personal observations, analysis, recommendations, or stating any other facts or opinions about Plaintiff, ZACHARY ADAMSON.

8. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, naming Plaintiff, ZACHARY ADAMSON, for any reason.

9. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, recounting or otherwise memorializing any contact you or anyone else had with Plaintiff, ZACHARY ADAMSON, on April 1, 2010.

10. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, relating to the use of force against suspects, persons in custody, or other persons arrested by you as an employee of the City of Buffalo and/or City of Buffalo Police Department.

11. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, relating to the search incident to arrest of suspects, persons of interest, persons in custody, or other persons arrested by you as an employee of the City of Buffalo and/or City of Buffalo Police Department.

12. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, explaining or otherwise expressing any personally held opinion, viewpoint, or any observation made about any policy of the City of Buffalo and/or City of Buffalo Police Department with regard to detaining and arresting of suspects, persons in custody, persons of interest, and other persons.

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14. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, explaining or otherwise expressing any personally held opinion, viewpoint, or any observation made about the arrest of Plaintiff, ZACHARY ADAMSON, on April 1, 2010.

15. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, explaining or otherwise expressing any personally held opinion, viewpoint, or any observation made about any investigation initiated or any procedure invoked in response to the treatment of Plaintiff, ZACHARY ADAMSON, during his arrest on April 1, 2010.

16. Produce a copy of any and all employment manuals, policies and procedures, rules and regulations, or other written employment instructions and guides provided to you by the City of Buffalo and/or Buffalo Police Department in regard to the following: a. Arresting an individual for a Felony, Misdemeanor or Violation; b. The restraining or subduing of suspects; c. The use of force when making an arrest and d. The use of force when restraining or subduing a suspect.

17. Produce a copy of any and all use of force reports relating to the incident which occurred on April, 1 2010 at approximately 7:15 p.m.

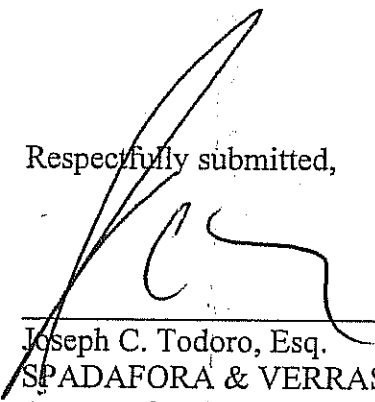
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19. Produce a copy of your personnel file as an employee of the City of Buffalo and/or City of Buffalo Police Department.

20. Produce a copy of any and all performance evaluations in the five (5) years preceding the subject incident and since that period of time including any and all performance evaluation for April 1, 2010.

Dated: July 2, 2012
Buffalo, New York

Respectfully submitted,



Joseph C. Todoro, Esq.
SPADAFORA & VERRASTRO, LLP
Attorney for Plaintiff
2 Symphony Circle
Buffalo, New York 14201-1340
(716) 854-1111

TO: Carmen J. Gentile, Esq.
Assistant Corporation Counsel
1100 City Hall, 65 Niagara Square
Buffalo, New York 14202
(716) 851- 4332

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**PLAINTIFF'S INITIAL
DOCUMENT DEMAND TO
DEFENDANT SHARON
ACKER**

Civil Docket No. 11-CV-0663A

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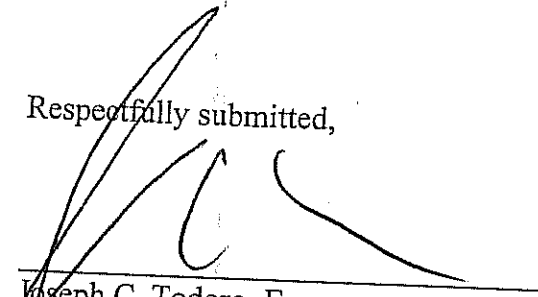
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Dated: July 2, 2012
Buffalo, New York

Respectfully submitted,



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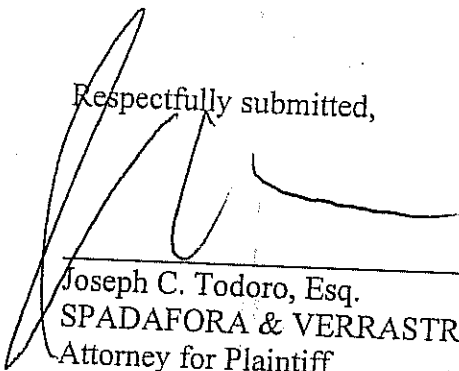
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